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April 8, 2018

VIA ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Raishani*, 17 Cr. 421 (GHW)

Dear Judge Woods:

I write on behalf of Adam Raishani to respectfully request an adjournment of the current schedule. At present, trial is to commence on June 11, 2018.

An adjournment is necessary because I am on trial in another matter, *United States v. Blaszczak*, 17 Cr. 357 (LAK), which will now end sometime in May. The significant overlap between these two clients and their trials prevents me from being able to provide Mr. Raishani, who faces a three-count terrorism indictment and a statutory maximum of 20 years on each count, with an adequate defense by the June 11 trial date. Mr. Raishani himself specifically requests additional time as he has a deep interest in receiving a meaningful defense. His need to properly prepare outweighs the public's interest in a speedy trial. While the government objects to the requested adjournment, their objection should be denied as they will suffer no actual prejudice by an adjournemnt. Mr. Raishani's requested adjournment serves the ends of justice; only then will he receive a meaningful and effective defense.

United States v. Blaszczak, 17 Cr. 357 (LAK), is a four-defendant case charging our clients with 18 counts of securities fraud and insider trading. The trial involved preparing for many fact and expert witnesses. The 3500 material alone comprised thousands of pages. Additional and voluminous *Giglio* material, requiring immediate review and investigation, was produced by the government on March 16, 2018.

Over our objection, trial was unexpectedly advanced to April 2, 2018, with jury selection beginning on March 26, 2018.¹ The trial was advanced because the government underestimated the time it would take to try the case. Rather than two to three weeks for the entire trial, it appears that the government's case will be at least three weeks (even including half-days on Friday), with the defense case of four defendants taking about another week, meaning the trial will only conclude sometime in May 2018. Given the unanticipated length of the *Blaszczak* trial, the overlap of its days with the days needed to properly prepare for Mr. Raishani's trial, and with Mr. Raishani in custody, I have been unable to give adequate attention to him and his case, and will provide him with ineffective counsel in the absence of the requested adjournment.

¹ As lead counsel, Mr. Patton asked for a January 2019 trial date. To accommodate the schedule of other defense counsel, trial was moved up to March 26, April 2018.

Hon. Gregory H. Woods, U.S.D.J.
Southern District of New York

April 8, 2018

United States v. Raishani, 17 Cr. 421 (GHW)

I note that the government has offered to agree to extend the April 23, 2018 deadline for in limine motions. This slight concession does not resolve the problem of being trial ready for Mr. Raishani. I have been on trial every weekday, including half-days on Friday, and will continue to be on that trial schedule until sometime in May 2018. During this time, I will have no chance to meet with Mr. Raishani in prison and work with him to prepare his defense.

I apologize for the necessity of this request but the only way to ensure effective representation for Mr. Raishani is by postponing the trial date.

I thank the Court for its ongoing attention to this matter.

Respectfully submitted,

/s/

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cc: AUSAs Turner, Kamaraju, and Kim